

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARIA LUISA G. RAMIREZ and	§	
TONY GUERRERO	§	
	§	
Plaintiffs,	§	
	§	
	§	CIVIL ACTION NO. 4:08-cv-00801
vs.	§	
	§	
FREDDIE RECORDS, INC.,	§	
FREDDIE MARTINEZ, SR., MARFRE, LTD.,	§	
STERLING MANAGEMENT, INC.,	§	
FREDDIE MARTINEZ, JR., JOHN	§	
MARTINEZ and JoANN MARTINEZ, and	§	
MARC J. MARTINEZ	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED

PLAINTIFFS' MOTION FOR BILL OF COSTS

TO THE HONORABLE COURT:

Judgment having been entered in the above entitled action on August 18, 2010, against Freddie Records, Inc., and Freddie Martinez, Sr., d/b/a/ Marfre Music Publishing, the Clerk is requested to tax the following as costs:

AWARD OF COSTS

1. Fees of the Clerk \$279.00
2. Fees for service of summons and subpoena \$462.00
3. Fees for printed or electronically recorded transcripts

necessarily obtained for use in the case:

- a. Depositions on Written Questions: \$14,634.88
- b. Deposition Transcripts: \$7,070.645

4. Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case \$4,401.00

TOTAL: \$26,847.55

Attached as **Exhibit A** is an itemization and documentation for requested costs in all categories.

WHEREFORE PREMISES CONSIDERED, Plaintiffs pray for an award of costs to be taxed against Defendants, and request all other relief to which they may be entitled.

Respectfully submitted,

SHOWALTER LAW FIRM

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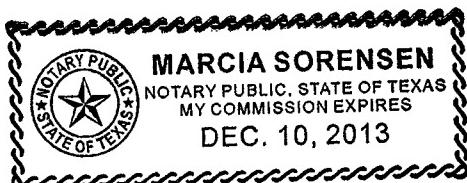
DECLARATION OF DAVID W. SHOWALTER

I declare under penalty of perjury that the foregoing costs are true, correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed and/or will be performed. Attached hereto as **Exhibit A** is a true and correct copy of the costs incurred by Plaintiffs' Counsel for filing fees, serving the summons, copying, depositions on written questions and deposition transcripts. The costs do not include costs for videotaping the depositions. The underlying supporting documentation is available for inspection, if necessary.



DAVID W. SHOWALTER

SUBSCRIBED AND SWORN TO before me by David W. Showalter, on this the 31st day of August, 2010.



Marcia Sorensen
NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was automatically accomplished on all known filing users through the Notice of Electronic Filing Service on this 31st day of August, 2010.



DAVID W. SHOWALTER